

STATEMENT OF BASIS (AI No. 140856)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0122467 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Allpax Products, Inc.
13510 Seymour Myers Blvd.
Covington, LA 70433

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Maxon Graham

DATE PREPARED: January 19, 2007

1. PERMIT STATUS

A. Reason For Permit Action:

First time issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5 year term.

B. NPDES permit - NPDES permit effective date: N/A
NPDES permit expiration date: N/A
EPA has not retained enforcement authority.

C. LPDES permits – LPDES permit effective date: N/A*
LPDES permit expiration date: N/A

*** The LAG480000 Light Commercial General Permit is currently in litigation and has been stayed by the court as of August 30, 2006. Therefore, the Louisiana Pollutant Discharge Elimination System (LPDES) general permit authorization number LAG480585 issued to Allpax Products, Inc. will be replaced by this individual permit. This facility will be authorized to discharge upon issuance of a final permit.**

D. Date Application Received: July 6, 2006

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY –

Allpax Products, Inc is an existing autoclave manufacturing facility, which manufactures all new food grade autoclaves for the USDA. The facility discharges hydrostatic test wastewater with no dyes or additives and shop floor washdown wastewater without soaps or detergents.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: III
4. SIC code: 3443

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C. LOCATION - 13510 Seymour Myers Blvd, Covington, St. Tammany Parish
Latitude 30° 27' 14", Longitude 90° 10' 44"

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: Hydrostatic test wastewater
Treatment: None
Location: at the point of discharge from the vessel bounded by Buildings B, C, & D
Flow: 550 GPD
Discharge Route: via local drainage to Lake Pontchartrain

Outfall 002

Discharge Type: Hydrostatic test wastewater
Treatment: None
Location: At the point of discharge from the vessel inside Building D
Flow: 550 GPD
Discharge Route: via local drainage to Lake Pontchartrain

Outfall 003

Discharge Type: Hydrostatic test wastewater
Treatment: None
Location: At the point of discharge from the vessel bounded by Building D & Hwy 1077
Flow: 550 GPD
Discharge Route: via local drainage to Lake Pontchartrain

Outfall 004

Discharge Type: Shop floor washdown wastewater without soaps and/or detergents
Treatment: None
Location: At the point of discharge from the shop floor drainage system at the corner of Building D.
Flow: intermittent
Discharge Route: via local drainage to Lake Pontchartrain

4. RECEIVING WATERS

STREAM - via local drainage to Lake Pontchartrain

BASIN AND SEGMENT - Lake Pontchartrain Basin, Segment 040802

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife
g. outstanding natural resources *

* Outstanding Natural Resource waters is listed as a designated use of subsegment 040802 (Lower Tchefuncte River). However, this designated use is applicable only if the discharge is directly into the named waterbody and not into a tributary or distributary of the waterbody per LAC 33:IX.1111.G.

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5. TMDL STATUS

Subsegment 040802, Lower Tchefuncte River- From the Bogue Falaya River down to LA Hwy 22, excluding any tributaries from the Bogue Falaya River south to LA Hwy 22 (Scenic), is listed on LDEQ's Final 2004 303(d) List as impaired for **Mercury**. The Environmental Protection Agency (EPA) has found the subsegment impaired for **Organic Enrichment/Low Dissolved Oxygen (DO) (Category 5)**. To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Lake Pontchartrain Basin, those suspected causes for impairment which are not directly attributed to the autoclave manufacturing point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated.

Shop floor washdown wastewater, hydrostatic test wastewater, and industrial stormwater discharged from this facility are not expected to contribute to the Mercury impairment in the subsegment. The Mercury impairment is suspected from atmospheric deposition from toxics and unknown sources.

EPA has found this subsegment impaired for Organic Enrichment/Low DO from an unknown source. Organic Enrichment/Low DO can be attributed to the discharge of shop floor washdown wastewater, and industrial stormwater discharge. This facility is located approximately five and a half miles from the point where its discharge enters Lake Pontchartrain. The effluent limitations and monitoring requirements detailed in this permit should maintain the water quality standards of the subsegment.

The limits placed in this permit for Total Organic Carbon (TOC) and the implementation of a Stormwater Pollution Prevention Plan (SWP3) are sufficient to protect the receiving waterbody from degradation due to shop floor washdown wastewater, and industrial stormwater discharge.

The 2005 Integrated Report listed that there is insufficient data whether or not all designated uses are being attained by this subsegment due to Chloride pollutants. It is believed that Chloride pollution is caused by drought-related impacts; therefore, Chlorides will not be addressed in this permit.

6. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

7. COMPLIANCE HISTORY/COMMENTS

A. Compliance History - No records of compliance actions were found.

B. DMR Review/Excursions - No DMR data were available for review since this is a first time issuance.

8. ENDANGERED SPECIES

The receiving waterbody, Subsegment 040802 of the Lake Pontchartrain Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Gulf Sturgeon, which is listed as an endangered species. LDEQ has not submitted this draft permit to the FWS for review in accordance with a letter dated September 29, 2006 from Watson (FWS) to Brown (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and based on information provided by the FWS, LDEQ has

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determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the Gulf Sturgeon. Effluent limitations are established in the permit to ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. The more stringent of technology and water quality based limits (as applicable) have been applied to ensure maximum protection of the receiving water.

9. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

10. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

11. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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Rationale for Allpax Products, Inc.

1. Outfall 001, 002, 003 - Hydrostatic test wastewater (estimated flow -550 gpd from each)

Parameter	Limitation		Reference
	Monthly Average	Daily Maximum	
Flow	Report	Report	LAG670000; similar discharges
TSS	---	90 mg/L	LAG670000; similar discharges
Oil and Grease	---	15 mg/L	LAG670000; similar discharges
pH – Allowable Range (s.u.)	6.0 (min)	9.0 (max)	LAG670000; similar discharges

Treatment: None

Monitoring Frequency: once prior to proposed discharge at the point of discharge from various vessels

Limits Justification: Limits and monitoring frequencies are based on BPJ, current guidance for similar discharges from other facilities and the Hydrostatic Test Wastewater General Permit, LAG670000, requirements for discharges from new pipes, vessels or tanks, because this facility uses no dyes or additives, a TOC limit is not necessary.

2. Outfall 004 - Shop floor washdown wastewater (estimated flow – intermittent)

Parameter	Limitation		Reference
	Monthly Average	Daily Maximum	
Flow (GPD)	Report	Report	LAG480000; similar discharges
TOC	---	50 mg/L	LAG480000; similar discharges
Oil and Grease	---	15 mg/L	LAG480000; similar discharges
pH – Allowable Range (s.u.)	6.0 (Min)	9.0 (Max)	LAG480000; similar discharges

Treatment: None

Monitoring Frequency: Quarterly at the point of discharge from the shop floor drainage system at the corner of Building D.

Limits Justification: Limits and monitoring frequencies are based on BPJ, current guidance for similar discharges from other facilities, and the Light Commercial General Permit, LAG480000 effective August 1, 2001.

BPJ Best Professional Judgment
Su Standard Units

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NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water shall not be required to obtain and LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 3443 are considered to have storm water discharges associated with industrial activity.

The SWP3 shall be prepared, implemented, and maintained within (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in the storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).